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A community vision for our region SEP 23 PH 2: 09

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September 20, 2010

Kathleen Cole Harder Regional Water Quality Control Board, Central Valley Region 11020 Sun Center Dr., Suite #200 Rancho Cordova, CA 95670

Re: SRCSD Tentative Discharge Permit

Dear Ms. Harder:

I am a property owner and real estate developer in the Sacramento region and I strongly urge the Regional Water Quality Control Board to ensure there is sound and compelling science before making any decisions with respect to Sacramento's ammonia discharges in connection with the decision on the District's discharge permit. It is my understanding there is a lacking consensus amongst the scientific community on Sacramento's ammonia discharges being the sole "culprit" in the Delta's ongoing water quality decline. Making a profoundly important decision without sound science has the potential to straddle the region with billions of dollars in expenses; thousands of jobs lost, and may not have any environmental benefit to the Delta.

If sound science does deem Sacramento's ammonia discharges are declining the Delta fishes, then it is in every citizen's best interest in the region if the costs of the improvements are spread out and not just borne through new construction impact fees. An additional \$35,000 building permit fee (based on preliminary estimates of compliance) would render all real estate projects infeasible and on hold indefinitely. Cumulatively throughout the region, this would eliminate thousands of jobs in the building industry and an enormous economic loss for the region. Such additional fees would make affordable housing impossible in our region.

With far fewer building permits being sought, SRCSD would lack sufficient revenues to pay down the debt service on the improvements. As such, it is critical SRCSD not be put into a position to where there is potential to default on debt.

In conclusion, it is essential that your Board takes sound science into consideration before any final decisions are made. There should be no improvements necessary to Sacramento's discharge until there is consensus on the science that Sacramento's ammonia is negatively impacting the Delta. If sound science does deem Sacramento's ammonia discharges are associated with the Delta's fish decline, then any necessary improvement costs must be absorbed entirely through user rates.

Thank you for your attention to my letter.

Sincerely, Mulliant

Ron Alvarado